

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS’
ADMINISTRATIVE MOTION TO EXTEND
EXPERT DISCOVERY DEADLINES FOR
WAVE 1 BELLWETHER CASES**

This Document Relates to:

ALL WAVE 1 BELLWETHER CASES

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17 Floor

DECLARATION OF SARAH R. LONDON
Case No. 3:23-md-03084-CRB

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. On May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1
8 Case Assignments and Discovery Schedule. PTO 26 required the parties to exchange expert reports
9 by August 8, 2025 and rebuttal expert reports by September 8, 2025.

10 3. PTO 26 was modified by Stipulation and Court Order to require the parties to
11 submit expert reports by August 22, 2025, and rebuttal expert reports by September 22, 2025. ECF
12 3533.

13 4. PTO 26 was further modified by Stipulation and Court Order to require the parties
14 to submit expert reports by August 29 and rebuttal expert reports by September 29. ECF 3705.

15 5. At the August 22, 2025 Case Management Conference, the Court informed the
16 parties that the first bellwether trial will begin on January 6, 2026, rather than December 8, 2025.
17 ECF 3725.

18 6. Plaintiffs sent Defendants proposed adjustments to the schedule on Friday, August
19 22, and discussed this proposal with Defense Counsel via phone call on Saturday, August 23 to
20 request that Uber agree to the limited stipulation to extend the expert deadlines.

21 7. Plaintiffs sent Defendants a draft stipulation regarding the expert discovery
22 deadlines on Monday, August 25, 2025.

23 8. On Monday, August 25, 2025, counsel for Defendants informed Plaintiffs that they
24 were not able to sign off on the proposed stipulation by the end of the day, but hoped to obtain
25 client consent the next day.

26 9. Plaintiffs have been working diligently to meet the August 29, 2025 deadline for
27 expert reports.
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